## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

IN RE: REMBRANDT TECHNOLOGIES, LP PATENT LITIGATION,

MDL Docket No. 07-md-1848 (GMS) (All Cases)

MOTOROLA, INC., CISCO SYSTEMS, )
INC., SCIENTIFIC-ATLANTA, INC., ARRIS)
GROUP, INC., THOMSON, INC., AMBIT )
MICROSYSTEMS, INC., and NETGEAR, )
INC., )

Plaintiffs,

٧.

REMBRANDT TECHNOLOGIES, LP,

Defendant.

REMBRANDT TECHNOLOGIES, LP, and PREMBRANDT TECHNOLOGIES, LLC d/b/a REMSTREAM,

Counter-Plaintiffs,

v.

MOTOROLA, INC., CISCO SYSTEMS, INC., SCIENTIFIC-ATLANTA, INC., ARRIS GROUP, INC., THOMSON, INC., AMBIT MICROSYSTEMS, INC., NETGEAR, INC., TIME WARNER CABLE, INC., TIME WARNER CABLE, LLC, TIME WARNER NEW YORK CABLE, LLC, TIME WARNER ENTERTAINMENT COMPANY, LP, COMCAST CORPORATION, COMCAST CABLE COMMUNICATIONS, INC., CHARTER COMMUNICATIONS, INC., CHARTER COMMUNICATIONS

OPERATING, LLC, COXCOM, INC., COX COMMUNICATIONS, INC., COX ENTERPRISES, INC., CSC HOLDINGS,

C.A. No. 07-752 (GMS)

INC., CABLEVISION SYSTEMS CORPORATION, ADELPHIA COMMUNICATIONS CORPORATION, CENTURY-TCI CALIFORNIA COMMUNICATIONS, LP, CENTURY-TCI HOLDINGS, LLC, COMCAST OF FLORIDA/PENNSYLVANIA, LP (f/k/a PARNASSOS, LP), COMCAST OF PENNSYLVANIA II, LP (f/k/a CENTURY-TCI CALIFORNIA, LP), PARNASSOS COMMUNICATIONS, LP, ADELPHIA CONSOLIDATION, LLC, PARNASSOS HOLDINGS, LLC, and WESTERN NY CABLEVISION, LP, Counter-Defendants.

## PROPOSED STIPULATION TO AMEND SCHEDULING ORDER

WHEREAS, the parties have been discussing various amendments to the pleadings and procedures to propose to the Court to simplify management of the MDL proceedings;

WHEREAS, Rembrandt and parties adverse to Rembrandt intend to amend their pleadings;

WHEREAS, paragraph 2 of the proposed Scheduling Order filed with the Court on March 10, 2008 (D.I. 103) sets a March 28, 2008 deadline for amendments to the pleadings; and

WHEREAS, the parties request additional time to meet and confer on necessary amendments to the pleadings, and wish to extend the March 28, 2008 deadline for motions to amend the pleadings to allow further discussions.

IT IS THEREFORE STIPULATED AND AGREED by the parties, subject to the approval of the Court, that paragraph 2 of the March 10, 2008 proposed Scheduling Order is amended to extend the deadline for motions to amend the pleadings to be filed with the Court on or before April 11, 2008.

## CONNOLLY BOVE LODGE & HUTZ LLP

/s/ Collins J. Seitz, Jr.

Collins J. Seitz, Jr. (#2237)
Francis DiGiovanni (#3189)
James D. Heisman (#2746)
Kristen Healey Cramer (#4512)
1007 N. Orange Street
Wilmington, Delaware 19899
(302) 658-9141
cseitz@cblh.com
fdigiovanni@cblh.com
jheisman@cblh.com
kcramer@cblh.com

Counsel for Rembrandt Technologies, LP

YOUNG CONAWAY STARGATT AND TAYLOR, LLP

/s/ John W. Shaw

Josy W. Ingersoll (#1088) John W. Shaw (#3362) Jeffrey T. Castellano (#4831) 1000 West Street Wilmington, DE 19801 (302) 571-6600 jingersoll@ycst.com jshaw@ycst.com jcastellano@ycst.com

Co-Liaison Counsel for All Parties Other Than Rembrandt

IT IS SO ORDERED, this of March, 2008.

Morris, Nichols, Arsht & Tunnell Llp

/s/Jack B. Blumenfeld

Jack B. Blumenfeld (#1014) Karen Jacobs Louden (#2881) 1201 N. Market Street P.O. Box 1347 Wilmington, DE 19899 (302) 658-9200 jblumenfeld@mnat.com

Co-Liaison Counsel for All Parties Other Than Rembrandt

Chief Judge, United States District Court